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*Attorneys for Lead Plaintiff Michael Sanders  
and Co-Lead Counsel for Class*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ROBERT DE VITO, Individually And  
On Behalf Of All Others Similarly  
Situated,

Plaintiff,

vs.

LIQUID HOLDINGS GROUP, INC.,  
BRIAN M. STORMS, KENNETH D.  
SHIFRIN, PETER R. KENT, RICHARD  
SCHAEFFER, BRIAN FERDINAND,  
JAY BERNSTEIN, DARREN DAVY,  
DAVID FRANCESCANI, WALTER  
RAQUET, THOMAS ROSS, VICTOR  
SIMONE, JR., DENNIS SUSKIND,  
ALLAN ZAVARRO, and SANDLER  
O'NEILL & PARTNERS, L.P.,

Defendants.

Case No. 2:15-cv-06969-KM-JBC

UNOPPOSED APPLICATION FOR  
ADMISSION PRO HAC VICE

**EDUARD KORSINSKY**, of full age, hereby certifies as follows:

1. I am a member of the law firm of Levi & Korsinsky LLP. I am admitted

to practice before the Courts of the State of New Jersey and the United States District Court for the District of New Jersey. I am a member in good standing of both bars, and I am not under suspension or disbarment by these courts or by any other court or jurisdiction.

2. I submit this Certification in support of the application by Lead Plaintiff Michael Sanders (“Sanders”), for the admission *pro hac vice* of Adam M. Apton, Esq., Levi & Korsinsky LLP, 1101 30<sup>th</sup> Street, Suite 115, Washington, D.C. 20007, to appear in this action as co-counsel for Sanders.

3. Pursuant to Local Civil Rule 101.1, I understand that all pleadings, briefs, stipulations, and other papers filed with the Court shall be signed by me or another attorney associated with Levi & Korsinsky LLP. Further, I agree to promptly notify the attorneys admitted *pro hac vice* of the receipt of all notices, orders and pleadings.

4. Pursuant to Local Civil Rule 101.1, I understand that I shall be held responsible for the conduct of the case and shall be present before the Court during all phases of these proceedings, unless expressly excused by the Court, as well as be held responsible for the conduct of the attorneys admitted *pro hac vice*.

5. On behalf of Sanders, I respectfully request that the Court grant its application to have Adam M. Apton, Esq., admitted *pro hac vice* to appear and participate in this matter pursuant to Local Civil Rule 101.1(c).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 3, 2016

/s/ Eduard Korsinsky  
Eduard Korsinsky

Adam M. Apton (aapton@zlk.com)  
LEVI & KORSINSKY LLP 1101  
30<sup>th</sup> Street, Suite 115  
Washington, D.C. 20007  
(202) 524-4859

(to be admitted *pro hac vice*)  
Eduard Korsinsky (ek@zlk.com)  
LEVI & KORSINSKY LLP  
30 Broad Street, 24<sup>th</sup> Floor  
New York, New York 10004  
(212) 363-7500

*Attorneys for Lead Plaintiff Michael Sanders  
and Co-Lead Counsel for Class*

**UNITED STATES DISTRICT COURT  
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SIMONE, JR., DENNIS SUSKIND,  
ALLAN ZAVARRO, and SANDLER  
O'NEILL & PARTNERS, L.P.,

Defendants.

Case No. 2:15-cv-06969-KM-JBC

CERTIFICATION OF ADAM M. APTON  
IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE

ADAM M. APTON, of full age, hereby certifies as follows:

1. I am an attorney-at-law duly admitted and currently in good standing to practice law in the State of New York (Reg. No. 4759841) and the District of Columbia (Reg. No. 1017720), and am an associate at Levi & Korsinsky LLP, 1101 30<sup>th</sup> Street, Suite 115, Washington, D.C. 20007.

2. I have been a member of the Bar of the State of New York and the District of Columbia since 2010 and 2013, respectively. The General Clerk's Office of the Supreme Court of the State of New York, Appellate Division, Second Department, maintains the roll of attorneys for the Bar of the State of New York upon which I am listed. The District of Columbia Court of Appeals maintains the roll of attorneys for the Bar of the District of Columbia upon which I am listed.

3. I am not under suspension or disbarment in any jurisdiction or court. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

4. I submit this Declaration in support of the application by Co-Lead Plaintiff Michael Sanders ("Sanders") to permit me to appear and participate, *pro hac vice*, as counsel for Sanders at pre-trial proceedings and at trial of the above-captioned action.

5. I specialize in the litigation of complex securities and investment advisory matters and am familiar with this matter.

6. I am associated in this matter with Eduard Korsinsky, a member of Levi & Korsinsky, who is the attorney of record for Sanders, is authorized to practice law in New Jersey, and is a member in good standing of the bar of this Court.

7. Upon being admitted to appear and participate in this matter, *pro hac vice*, I shall promptly make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a), for any year in which I continue to appear in this matter.

8. Upon being admitted to appear and participate in this matter, *pro hac vice*, I shall also promptly make payment to the Clerk of the United States District Court for the District of New Jersey as provided by Local Civil Rule 101.1(c)(3).

9. Pursuant to Local Civil Rule 101.1(c)(4), I understand that upon admission, *pro hac vice*, I am deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule, Rule 1:21-7, as amended.

10. I also understand that upon admission, *pro hac vice*, I am subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court and the New Jersey State Bar in all respects as if I were regularly admitted and a licensed member of the Bar of the State of New Jersey in good standing. I agree to

notify the Court immediately of the institution of any disciplinary proceedings against me or any matter affecting my standing at the bar of any other Court.

11. For the foregoing reasons, it is respectfully requested that the Court grant Sanders' application to have me admitted *pro hac vice* to appear and participate as counsel in this matter pursuant to Local Civil Rule 101.1(c).

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

EXECUTED this 3rd day of May, 2016, at Washington, D.C.

A handwritten signature in dark ink, appearing to read "Adam Apton", is written over a horizontal line.

Adam M. Apton

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Situating,

Plaintiff,

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Defendants.

Case No. 2:15-cv-06969-KM-JBC

**ORDER GRANTING  
APPLICATION FOR PRO HAC  
VICE ADMISSION**

**THIS MATTER** having been brought before the Court by Eduard Korsinsky, Esq., attorney for Co-Lead Plaintiff Michael Sanders ("Sanders"), for an Order allowing Adam M. Apton, Esq., to appear and participate *pro hac vice*; and the Court having considered the moving papers; and this matter being considered pursuant to FED.R.CIV.P. 78, and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2016,

**ORDERED** that Adam M. Apton, Esq., a member of the bar of the State of



New York and the District of Columbia, be permitted to appear *pro hac vice* in the above-captioned matter pursuant to L.Civ.R. 101.1(c); and it is further

**ORDERED** that all pleadings, briefs, and other papers filed with the Court shall be signed by a member or associate of the law firm of Levi & Korsinsky LLP, attorneys of record for movant Sanders, who is admitted to the Bar of this Court, who shall be held responsible for said papers and for the conduct of the case, and who will be held responsible for the conduct of the attorney admitted hereby; and it is further

**ORDERED** that Adam M. Apton, Esq., shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order; and it is further

**ORDERED** that Adam M. Apton, Esq., shall make payment of \$150.00 to the Clerk of the United States District Court in accordance with L.CIV.R. 101.1(c)(3), as amended, within twenty (20) days from the date of the entry of this Order; and it is further

**ORDERED** that Adam M. Apton, Esq., shall be bound by the Rules of the United States District Court for the District of New Jersey, including, but not limited to, the provisions of L.CIV.R. 103.1, Judicial Ethics and Professional Responsibility, and L.CIV.R. 104.1, Discipline of Attorneys;

**ORDERED** that Adam M. Apton, Esq., shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule, Rule 1:21-7, as amended; and it is further

**ORDERED** that Adam M. Apton, Esq., may file a request, the form of which is available at the Court's website, with the Clerk of the Court for *pro hac vice* counsel to receive electronic notifications in this matter.

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HON. JAMES B. CLARK  
UNITED STATES MAGISTRATE JUDGE